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*Attorney for Defendants the United States,  
David Karpel, David Arboreen, Agostino  
Brancato, and Matthew Wear*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JEREMY JOHN HALGAT, an individual,

Plaintiff,

V.

UNITED STATES OF AMERICA, et. al.,

Defendants.

Case No: 2:22-cv-00592-JCM-ECY

**STIPULATION FOR  
EXTENSION OF TIME FOR  
UNITED STATES' AND DAVID  
ARBOREEN'S RESPONSE  
(First Requested Extension)**

Pursuant to Local Rule IA 6-1, Defendants the United States of America and David Arboreen, and Plaintiff Jeremy John Halgat (collectively, the “Parties”) stipulate to an extension of time for the United States and David Arboreen to respond to Plaintiffs’ Complaint. This is the first stipulation for an extension. The reason for this stipulation is to align the due date for the United States and David Arboreen to respond to the Complaint with the due date for the responses from Defendants David Karpel, Agostino Brancato, and Matthew Wear. All of the Defendants intend to file motions to dismiss. Aligning the due dates for their responses would facilitate a consolidated briefing schedule for their motions, which would serve the purpose of judicial economy.

The United States' response is currently due August 29, 2022. Defendant Arboreen's response is currently due August 29, 2022. The due date for responses from Defendants Karpel, Wear, and Brancato is currently October 7, 2022. The parties stipulate that the responses from the United States and Defendant Arboreen will now also be due October 7, 2022. The parties further stipulate that Plaintiffs will have thirty-five (35) days to file their responses to the

1 motions filed by the United States and Defendants Karpel, Arboreen, Brancato, and Wear; and  
2 the United States and Defendants Karpel, Arboreen, Brancato, and Wear will have twenty-one  
3 (21) days thereafter to file any replies.

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5 Respectfully submitted this 17th day of August 2022.

6 BRIAN M. BOYNTON  
7 Acting Assistant Attorney General  
8 Civil Division

9 C. SALVATORE D’ALESSIO, JR.  
10 Acting Director  
11 Torts Branch, Civil Division

12 ANDREA W. MCCARTHY  
13 Acting Assistant Director  
14 Torts Branch, Civil Division

15 /s/Glenn S. Greene<sup>1</sup>  
16 GLENN S. GREENE  
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27 *Attorneys for Defendants the United*  
28 *States, David Karpel, David*  
*Arboreen, Agostino*  
*Brancato, and Matthew Wear*

14 IT IS SO ORDERED:

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18 RICHARD F. BOULWARE, II  
19 UNITED STATES DISTRICT JUDGE

20 DATED this 19th day of August, 2022.

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28 <sup>1</sup> Counsel has previously been admitted to practice before this Court during the period of his employment by the United States as an attorney. *See* Dkt. No. 9, *Gonzalez, et al. v. United States, et al.*, Case No. 2:22-cv-00328-JCM-ECY (D. Nev.).

1 /s/ Melanie A. Hill  
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9 [Melanie@MelanieHillLaw.com](mailto:Melanie@MelanieHillLaw.com)  
10 *Attorneys for Plaintiff Jeremy John*  
11 *Halgat*

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14 IT IS SO ORDERED:

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United States District Judge

Dated: \_\_\_\_\_

**PROOF OF SERVICE**

I, Glenn S. Greene, certify that the following individual was served with a copy of the  
**STIPULATION FOR EXTENSION OF TIME FOR UNITED STATES' AND DAVID**  
**ARBOREEN'S RESPONSE** on the date and by the identified method of service below:

**ELECTRONIC CASE FILING:**

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Dated this 17th day of August 2022

/s/ Glenn S. Greene  
GLENN S. GREENE  
Senior Trial Attorney